

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:

Robert T Carlson and Mary M Carlson,

Debtor(s).

C/A No.: 17-03874-hb

CHAPTER 13

OBJECTION TO CONFIRMATION OF  
DEBTORS' CHAPTER 13 PLAN

Sparta GP Holding REO Corp (the "Creditor"), a secured creditor of the above-named Debtors, hereby objects to the confirmation of the Debtors' Chapter 13 plan on the following grounds:

1. Creditor is the holder of a note and first mortgage on real property located at 106 Fire Pink Way, Landrum, SC 29356.
2. Debtors' proposed Chapter 13 plan filed on January 10, 2018 states that Debtors intend to market and sell the real property. ECF Doc. No. 24.
3. Creditor does not oppose the sale of the Real Property conditioned upon the following:  
(1) Payment in full of the balance of the Loan at the closing the sale; (2) a proper payoff quote to be ordered before the closing; and (3) that any sale short of a full payoff be subject to the Creditor's final approval.

WHEREFORE, for these reasons, Creditor prays that the Court deny confirmation of the Debtors' proposed Chapter 13 plan filed on January 10, 2018, and allow the Debtors to file an amended plan which provides for clearer treatment of Creditor's lien.

Respectfully submitted,

/s/ Jason D. Wyman

John J. Hearn (I.D. 6494)

Jason D. Wyman (I.D. 11294)

Kevin T. Brown (I.D. 5801)

Attorneys for the Creditor

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Columbia, South Carolina

February 21, 2018

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CERTIFICATE OF SERVICE

I, the undersigned employee of ROGERS TOWNSEND & THOMAS, PC, do hereby  
certify that a copy of the Objection to Confirmation of Debtors' Chapter 13 Plan was mailed to  
the parties listed below:

Robert T Carlson  
Mary M Carlson  
106 Fire Pink Way  
Landrum, SC 29356

Daniel A. Stone  
Stone Law Firm  
PO Box 3884  
Irmo, SC 29063

Gretchen D. Holland (via CM/ECF only)  
Chapter 13 Trustee  
20 Roper Corners Circle, Suite C  
Greenville, SC 29615

/s/ Lori Qualls

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ROGERS TOWNSEND & THOMAS, PC  
Lori Qualls, Bankruptcy Paralegal  
P.O. Box 100200  
Columbia, SC 29202  
(803) 744-4444

Columbia, South Carolina  
February 22, 2018